IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

22-CR-0013 JLS

LAMBORGHINI LUCAS,

Defendant.

INFORMATION

(Title 18, United States Code, Section 922(a)(1)(A)

COUNT 1

The United States Attorney Charges That:

Beginning on or before August 6, 2021, the exact date being unknown, and continuing until on or about August 6, 2021, in the Western District of New York, the defendant, LAMBORGHINI LUCAS, not being a licensed manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of manufacturing firearms.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

DATED: Buffalo, New York, March 3, 2022.

TRIMI E ROSS

United States Attorney

BY:

SETH T. MOLISANI

Assistant United States Attorney United States Attorney's Office Western District of New York 138 Delaware Avenue

Buffalo, New York 14202

716-843-5881

Seth.Molisani@usdoj.gov